## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

KARL W. KROUSE : Bankruptcy No. 17-70322

BETTY C. KROUSE :

Debtors : Chapter 13

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BETTY C. KROUSE

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Movant : Motion No.

:

: Document No.

HELPMATES INCORPORATED

v.

250 West Main St

Ridgway, PA 15853-1611

Respondent :

## MOTION TO TERMINATE WAGE ATTACHMENT AGAINST HELPMATES INCORPORATED

AND NOW comes counsel for the Movant/Debtor and files the following Motion requesting an Order be entered to terminate a wage attachment in the above captioned case:

- 1. A Chapter 13 case was filed on or about July 20, 2016 and subsequently confirmed.
- 2. An Order to Attach Wages was filed against the above Respondent to Docket Number 22 on 8/19/16.
- 3. The Chapter 13 case was converted to a Chapter 7 on April 2, 2018 to Docket Number 78.
- 4. By reason of the conversion, a wage attachment is no longer needed against the Respondent and this Motion is filed to terminate the same.

WHEREFORE, the Movant/Debtor BETTY C. KROUSE requests this Court to terminate the Order to Pay the Trustee pursuant to the wage attachment filed against the above named Respondent.

Respectfully submitted,

Earle D. Lees, Jr., Esq. / Earle D. Lees, Jr., Esquire P.O. Box 685 DuBois, PA 15801 (814) 375-9310 PA ID 15763

4/5/18 Dated